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September 27, 2022

The Honorable Denise L. Cote
500 Pearl Street
New York, NY 10007-1312

Re: Google LLC v. Dmitry Starovikov, et al. Docket No. 1:21-cv-10260-DLC

Dear Judge Cote:

I represent defendants Dmitry Starovikov and Alexander Filippov (hereinafter, "Defendants") in the above-referenced matter. I am writing pursuant to the Court's Order, ECF # 124, to inform the Court what Information in discovery responses Defendants would like to keep sealed.

Defendants request that Responses to Request for Production #7, Plaintiff's sealed Exhibit 3 and 5, remain sealed. Defendants further request that the actual source code and screenshots (jpeg files) provided to Plaintiff as part of the discovery responses, and mentioned as responses in Plaintiff's sealed exhibit, remain private and are not posted on Pacer or anywhere else, where the public can have access. The reason for this is because the information provided is subject to the Nondisclosure Agreement (NDA) Defendants signed with Valtron and which itself was provided to Plaintiff as part of discovery responses.

Defendants also request that Responses to Interrogatory # 14, Plaintiff's sealed Exhibit 2 and 4, are kept under seal. The reason is that the responses to Interrogatory #14 contain private personal information, including about past business ownership and a close relative.

Defendants request that responses to Request for Production # 6, Plaintiff's sealed Exhibit 3 and 5, are kept under seal. Defendants further request that the actual documents provided as discovery responses to Request for Production # 6, in Plaintiff's sealed Exhibit # 3 and 5, remain private and are not posted on Pacer or anywhere else, where the public can have access. The reason for this is because the information provided is subject to the Nondisclosure Agreement (NDA) Defendants signed with Valtron and which itself was provided to Plaintiff as part of discovery responses.

Defendants request that responses to Request for Production # 23, Plaintiff's sealed Exhibit 3 and 5, are kept under seal. Defendants further request that the actual documents provided as discovery responses to Request for Production # 23, in Plaintiff's sealed Exhibit # 3 and 5, remain private and are not posted on Pacer or anywhere else, where the public can have access. The reason for this is because the information provided is subject to the Nondisclosure Agreement (NDA) Defendants signed with Valtron and which itself was provided to Plaintiff as part of discovery responses.

Thank you for your attention to this letter.

Respectfully,

cc: Counsel of Record (via ECF)

s/ Igor Litvak
Igor Litvak, Esq.